## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ABC Corporation I et al,

Plaintiff,

**CASE NO.** 1:20-cv-04806

v.

Judge: Honorable Thomas M. Durkin

THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",

Defendants.

## DEFENDANT AND THIRD-PARTY RESPONDENTS' MOTION FOR SUMMARY JUDGEMENT OF NON-INFRINGEMENT

Come Now, Defendant Gyroor-US ("Defendant" or "Gyroor-US") and Third-Party Respondents Gyroor, Urbanmax, GaodeshangUS, Fengchi-US, Gyroshoes, and HGSM (collectively, "Third-Party Respondents") respectfully move the Court to grant summary judgment of non-infringement of Defendant and Third-Party Respondents' Accused Product A, Accused Product B, Accused Product C, Accused Product D, and Accused Product E.

In support of this Motion, Defendant and Third-Party Respondents herewith submit a Memorandum of Law.

Date: 9/6/2023 /s/ Na Zhang

Na Zhang, Esq Glacier Law LLP 506 Second Ave., Ste 1516 Seattle, WA 98104 Na Zhang, Esq. queena.zhang@glacier.law 206-397-8633 GLACIER LAW LLP 41 Madison Avenue, Ste 2529 New York, NY 10010 Wei Wang, Esq. wei.wang@glacier.law 332-777-7315

GLACIER LAW LLP 9660 Flair Dr., Ste 328 El Monte, CA 91731 Yu-Hao Yao, Esq. mickey.yao@glacier.law 312-448-7772

GLACIER LAW LLP 200 E. Randolph Dr., Ste. 5100 Chicago, IL 60601 Ruoting Men, Esq. ruoting.men@glacier.law Tianyu Ju, Esq. Iris.ju@glacier.law 312-270-0413

Attorneys for Defendant and Third-Party Respondents

**CERTIFICATE OF SERVICE** 

I HEREBY CERTIFY that on this September 6, 2023, I electronically filed the foregoing

file with the Clerk of Court using the CM/ECF system, and service was perfected on all counsel

of record and interested parties through this system, which will deliver a true and correct copy of

the foregoing documents via CM/ECF.